

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

<b>IN RE:</b>	)	
	)	<b>Case No. 3:20-bk-03560</b>
<b>LG ORNAMENTALS, LLC</b>	)	<b>Chapter 7</b>
	)	<b>Judge Marian F. Harrison</b>
<b>Debtor.</b>	)	

---

**RESPONSE TO DEBTOR'S OBJECTION TO CLAIM**

COMES NOW Milessa Thomas, a creditor and party-in-interest in the above-captioned case, by and through her attorneys, and hereby files her Response to Debtor's Objection to Claim (Docket No. 67). In support of such, she states as follows:

1. Debtor objects to the claim of Milessa Thomas (Claim 7-1) in the amount of \$500,000.00, on the grounds that this claim is contingent, unliquidated, and disputed.
2. That there has been no adjudication in any court as to the liability or the validity of the amount.
3. Ms. Thomas would argue that due to the nature of the claim and the lack of prior litigation in state court, Ms. Thomas would anticipate this case being placed on a track similar to an adversary proceeding, including deadlines for discovery and a trial date. The parties will likely be able to agree to a schedule prior to the scheduled hearing, but if an agreement is not reached by that date, Ms. Thomas would request the Court set those dates at that time.
4. Ms. Thomas states that the evidence and testimony presented at a hearing on this matter will prove the validity and value of her claim.

**WHEREFORE, PREMISES, CONSIDERED,** Ms. Thomas respectfully prays that the objection be denied and that the appropriate scheduling dates be ordered.

Respectfully Submitted:

/s/ Justin T. Campbell  
Justin Campbell, (#031056)  
Thompson Burton PLLC  
1801 West End, Suite 1550  
Nashville, TN 37203  
P: 615-465-6015  
[justin@thompsonburton.com](mailto:justin@thompsonburton.com)

Counsel for Creditor Milessa Thomas

**CERTIFICATE OF SERVICE**

I hereby certify that I have sent a true and exact copy of the foregoing to the Assistant United States Trustee, and all other parties of record to receive notice electronically via the United States Bankruptcy Court's CM/ECF system, this 1st day of December, 2021.

/s/ Justin T. Campbell  
Justin Campbell